

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**UNITED STATES OF AMERICA,**

**v.**

**FRED CALVERT**

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**No. 07 CR 707**

**Judge Ronald A. Guzman**

**AGREED MOTION TO EXTEND TIME FOR  
THE FILING OF PRE-TRIAL MOTIONS**

\_\_\_\_ NOW COMES the Defendant, FRED CALVERT, by his attorney, JERRY BISCHOFF, and moves this Honorable Court to Extend Time for the Filing of Pre-Trial Motions. In support thereof, Defendant states as follows:

1. Defendant was arraigned on November 21, 2007 and entered a plea of not guilty to possession with intent to distribute cocaine pursuant to 18 U.S.C. §846; possession of a gun pursuant to 18 U.S.C. §924(c); and possession of a weapon by a felon pursuant to 18 U.S.C. §922(g);
2. This Court ordered a 16.1(a) conference to occur by November 30, 2007, ordered pre-trial motions to be filed by December 6, 2007, and set a status hearing for December 18, 2007. Defense counsel just received the 16.1(a) material on December 4, 2007;
3. There are more than 250 pages of discovery and 18 disks of recordings. Defense Counsel needs additional time to review discovery and prepare pre-trial motions;
4. Counsel requests that this court extend time to file pre-trial motions to January 2, 2008;
5. Counsel has spoken to AUSA Ed Siskel and he does not oppose counsel's motion;
6. Co-counsel has filed an identical motion requesting an extension of time;

WHEREFORE, the Defendant, FRED CALVERT, requests that this Honorable Court extend time to file pre-trial motions until January 2, 2007.

Respectfully submitted,

S/ Jerry Bischoff  
Jerry Bischoff, Attorney for  
Fred Calvert

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